

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

TIFFANI M. SHAFFER,

Plaintiff,

v.

CRANBERRY TOWNSHIP,

Defendant.

) CIVIL DIVISION

)

) No: 19-1481

)

) District Judge Christy Criswell

) Wiegand

)

) **ELECTRONICALLY**

) **FILED**

)

) **JURY TRIAL DEMANDED**

**JOINT EXHIBIT LIST**

**Joint Exhibits**

<b>EXHIBIT #</b>	<b>DATE</b>	<b>AUTHOR</b>	<b>TYPE OF DOCUMENT</b>	<b>OBJECTION (AUTHENTICITY)</b>	<b>OBJECTION (ADMISSIBILITY)</b>
J1	Various	Cranberry Township and Dr. Udrea	Essential Duties List with Doctor's Notes (CT0001-6)		
J2	June 8, 2018	Dr. Udrea	Letter from Dr. Udrea dated June 8, 2018 (CT_714)		

EXHIBIT #	DATE	AUTHOR	TYPE OF DOCUMENT	OBJECTION (AUTHENTICITY)	OBJECTION (ADMISSIBILITY)
J3	06/22/18	S. Goettler	Letter from Goettler to Shaffer dated June 22, 2018 (CT0715-716)		
J4	Dated July 11, 2018; Received July 13, 2018	EEOC	Notice of Charge of Discrimination received by Defendant (ECF No. 40-9)		
J5	July 24, 2017 – July 9, 2018	K. Meyer / M. Irvin / J. Panepinto	Emails between Meyer and Shaffer re “Schedule” (CT_644-645)		
J6	July 24, 2017	K. Meyer / M. Irvin / J. Panepinto	Emails between Meyer and Shaffer re “PICS Investigation OC” (CT_774-75)		
J7	August 1-3, 2018	K. Meyer / Ms. Shaffer	Emails between Meyer and Shaffer re “Friday 8/3” (CT_631-632)		
J8	August 7-9, 2018	K. Meyer / Ms. Shaffer	Emails between Meyer and Shaffer re “8/9” (CT0585-588)		
J9	July 29, 2018	K. Meyer / Ms. Shaffer	Emails between Meyer and Shaffer re “Schedule” (CT0599)		

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J10	September 6, 2018	K. Meyer	Letter to Shaffer dated September 6, 2018 (SHAFFER000095)		
J11	December 12, 2017	Cranberry Township and Police Association	Excerpt from Collective Bargaining Agreement (CT 884-912)		
J12	October 11, 2018	R. Hawk / K. Meyer	Emails between R. Hawk and Meyer re "VACATION DAY" (CT0796)		
J13	02/21/14	Kevin Meyer	Memorandum re J. Kobistek dated February 18, 2015 (SHAFFER00175)		
J14	02/18/15	Kevin Meyer	Memorandum re R. Evanson dated February 21, 2014 (SHAFFER00174)		
J15	Various	Ms. Shaffer	Shaffer's Time Sheets (CT0530-557)		
J16	Various	M. Shields	Shields' Time Sheets (CT0994-1003)		
J17	Various	W. Roberts	Roberts' Time Sheets (1106-1175)		

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J18	Various	J. Kobistek	Kobistek's Time Sheets (CT1176-1201)		
J19	Various	R. Evanson	Evanson's Time Sheets (CT1227-1282)		
J20	July 2, 2018	Ms. Shaffer	Shaffer's Original EEOC Charge and Inquiry (SHAFFER000001-4)		
J21	November 7, 2018	Ms. Shaffer	Shaffer's Amended EEOC Charge (SHAFFER000007-8)		
J22	June 15, 2018	K. Meyer / M. Irvin	June 15, 2018 Email Chain re: PICS Cases (CT_608)		
J23	July 24, 2018	K. Meyer / M. Irvin / J. Panepinto	July 24, 2018 Email Chain re: PICS Investigation OC Bullington (CT_742-743)		
J24	July 25, 2018	K. Meyer / Ms. Shaffer	July 25, 2018 Email Chain re: tomorrow (CT_600)		
J25	July 29- 30, 2018	Ms. Shaffer / K. Meyer	July 30, 2018 Email Chain re: Schedule (CT_750)		
J26	August 31 – September 3, 2018	K. Meyer / Ms. Shaffer	September 3, 2018 Email Chain re: ID Card (CT_781- 782)		

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J27	Various	Ms. Shaffer	Ms. Shaffer's Typed Notes (SHAFFER_157-165)		
J28	Various	K. Meyer	Chief Meyers' Notes (CT808-810)		

**Plaintiff's Exhibits**

<b>EXHIBIT #</b>	<b>DATE</b>	<b>AUTHOR</b>	<b>TYPE OF DOCUMENT</b>	<b>OBJECTION (AUTHENTICITY)</b>	<b>OBJECTION (ADMISSIBILITY)</b>
P29	August 7-8, 2018	K. Meyer / Ms. Shaffer	Emails between Meyer and Shaffer re "8/8" (CT0590-591)		
P30	Various	Ms. Shaffer / C. Mascellino	Text messages between Shaffer and Mascellino (SHAFFER000191)		
P31	August 7, 2015-September 30, 2015	L. Thomas, B. Donaldson	Email re Mark Shields (CT1308)		
P32	October 19, 2015	Neva Stottler	Shields Return to Work Letter Dated October 19, 2015 (CT1304)		
P33	August 7, 2015	K. Meyer	Letter to W. Roberts dated August 7, 2015 (CT1323)		

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P34	February 5, 2015	Richard Cibella	Letter to J. Kobistek dated February 5, 2015 (CT1313-1315)		
P35	Unknown	Plaintiff's Counsel	Chart Set forth on Page 9 above (per Fed. R. Evid. 1006)		<b>Defendant's Position:</b> <b>Defendant objects to this chart and has filed a corresponding motion in limine.</b>
P36	September 18, 2020 and October 19, 2020	Cranberry Township	Defendant's Answers and Supplemental Answers to Plaintiff's First Interrogatories and Requests		
P37	December 10, 2020	Cranberry Township	Defendant's Answers to Plaintiff's Second Interrogatories and Requests		
P38	Unknown	Cranberry Township	Shaffer's W-2s from 2018 and 2019 (SHAFFER000061-62)		
P39	Various	Cranberry Township	Shaffer's 2018 Paycheck History (SHAFFER000140-154)		
P40	May 14, 2018	S. Goettler / Ms. Shaffer	Text Messages between Shaffer and Goettler (SHAFFER000183)		

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P41	July 23, 2018	B. Bertoncello	Email from B. Bertoncello to EEOC (SHAFFER EEOC000027)		

**Defendant's Exhibits**

EXHIBIT #	DATE	AUTHOR	TYPE OF DOCUMENT	OBJECTION (AUTHENTICITY)	OBJECTION (ADMISSIBILITY)
D42	02/08/21	Ms. Shaffer	Ms. Shaffer's Answers to Defendant Township's First Set of Interrogatories (ECF 40-6)		
D43	10/16/20	Plaintiff	Ms. Shaffer's Responses to Defendant Township's First Set of Request for Production		
D44	2018	Cranberry Township	Ms. Shaffer's 2018 Pay Sheets (ECF 40-4)		
D45	May 21- 22, 2018	A. Bell / T. Fessides	May 22, 2018 Email Chain re: CT Police Recognition (CT 648)		
D46	June 18, 2018	K. Meyer	June 18, 2018 Email re: Barb/Lori Time Off (CT 647)		

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D47	June 22, 2018	S. Goettler	June 22, 2018 Email re: Shaffer Modified Duty Letter (CT_607)		
D48	June 22, 2018	K. Meyer	June 22, 2018 Email Chain re: Ms. Shaffer's time (CT_569)		
D49	July 9, 2018	K. Meyer / Cindy Koss	July 9, 2018 Email Chain re: Graham School (CT_604)		
D50	July 10, 2018	K. Johanknecht / K. Meyer	July 16, 2018 Email Chain re: Reality Tour (CT_641)		
D51	July 27, 2018	K. Meyer	July 27, 2018 Email re: Deferring Time (CT_637)		
D52	August 9, 2018	K, Meyer	August 9, 2018 Email Chain re: eTrace Registration (CT_624)		
D53	September 5, 2018	K. Meyer / Ms. Shaffer	September 5, 2018 Email Chain re: Question (CT_580)		
D54	September 17-18, 2018	Ms. Shaffer / K. Meyer	September 18, 2018 Email Chain re: Reality Tour (CT_578)		



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D55	September 21, 2018	R. Hawk	September 21, 2018 Email Chain re: Clerk Vacation Days (CT_577)		
D56	September 24, 2018	C. Mascellino / K. Meyer	September 24, 2018 Email Chain re: Clerk Days Off (CT_615)		
D57	September 27, 2018	C. Mascellino / Ms. Shaffer	September 27, 2018 Email Chain re: Clerk's Vacations (CT_613)		
D58	October 18, 2018	K. Meyer / R. Hawk	October 18, 2018 Email Chain re: Vacation Days (CT_612)		
D59	October 23, 2018	K. Meyer / R. Hawk	October 23, 2018 Email Chain re: Ms. Shaffer's (CT_574)		

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D60	October 29, 2018	K. Meyer	October 29, 2018 Email re: Work Opportunities (CT_573)		
D61	October 29, 2018	K. Meyer / R. Hawk	October 29, 2018 Email Chain re: Office Vacation Days (CT_611)		
D62	November 2, 2018	K. Meyer	November 2, 2018 Email Chain re: Clerk Vacation Days (CT_609)		
D63	November 2, 2018	R. Hawk	November 2, 2018 Email re: Vacation Days (CT_802)		
D64	Various	S. Goettler	Stacy Goettler's Typed Notes (CT_811-12)		<p><b>Plaintiff's Position: This would be self-serving hearsay if offered by Defendant for its truth, but not if offered by Plaintiff.</b></p> <p><b>Defendant's Position: This is admissible under 803(1), 803(6) and/or 803(5).</b></p>

EXHIBIT #	DATE	AUTHOR	TYPE OF DOCUMENT	OBJECTION (AUTHENTICITY)	OBJECTION (ADMISSIBILITY)
D65	2020	K. Meyer	List of Patrol Officers and Seniority (CT_913)		
D66	TBD	Cranberry Township and Defense Counsel	A Chart to rebut Ms. Shaffer's proposed Chart at page 9 of Ms. Shaffer's Pretrial Statement	<b>Plaintiff's Position: Plaintiff reserves the right to object to this pending receipt of same.</b>	<b>Plaintiff's Position: Plaintiff reserves the right to object to this pending receipt of same.</b>